

Exhibit B

From: Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>
Sent: Thursday, December 28, 2023 4:15 PM
To: Siegel, Jonathan (USANYE); Kenneth Montgomery
Cc: Duncan Levin; Kassner, Gillian (USANYE); Stern, Dylan (USANYE)
Subject: Re: [EXTERNAL] Re: Ozy Media and Carlos Watson

Dear Jon,

This responds to the first question in your email below. It appears that documents subject to the protective order in the criminal case were inadvertently used in Mr. Watson's civil case. My understanding is that Mr. Watson's lawyers intend to move to redact any such information.

Thank you,

rss

From: "Siegel, Jonathan (USANYE)" <Jonathan.Siegel@usdoj.gov>
Date: Friday, December 22, 2023 at 12:26 PM
To: Kenneth Montgomery <ken@kjmontgomerylaw.com>
Cc: Duncan Levin <dlevin@levinpllc.com>, "Kassner, Gillian (USANYE)" <Gillian.Kassner@usdoj.gov>, Ron Sullivan <rsullivan@ronaldsullivanlaw.com>, "Stern, Dylan (USANYE)" <Dylan.Stern@usdoj.gov>
Subject: RE: [EXTERNAL] Re: Ozy Media and Carlos Watson

Ron and Ken,

Thanks for the call earlier. We're writing to confirm our understanding that you'll consult with your clients and by January 5 (1) let us know whether you can confirm that neither Watson nor Ozy provided documents produced in discovery in our case to Ozy's civil counsel in its litigation against BuzzFeed and others (or to anyone else in violation of the Protective Order); (2) if you can so confirm, let us know where the internal BuzzFeed documents quoted in the complaint were obtained if not from discovery in our case; and (3) produce a copy of the Rao letter quoted in the complaint, if it has not been produced by Watson or Ozy already.

Have a good Christmas and New Years.

Best,
Jon

Jonathan Siegel
Assistant United States Attorney
Eastern District of New York
271A Cadman Plaza East
Brooklyn, New York 11201

Tel: 718-254-6293

Email: Jonathan.Siegel@usdoj.gov

From: Kenneth Montgomery <ken@kjmontgomerylaw.com>

Sent: Friday, December 22, 2023 8:19 AM

To: Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>

Cc: Duncan Levin <dlevin@levinpllc.com>; Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>; Stern, Dylan (USANYE) <DStern1@usa.doj.gov>

Subject: Re: [EXTERNAL] Re: Ozy Media and Carlos Watson

kenneth@kjmontgomerylaw.com

396 Waverly Ave

Brooklyn, New York 11238

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On Fri, Dec 22, 2023 at 8:16 AM Siegel, Jonathan (USANYE) <Jonathan.Siegel@usdoj.gov> wrote:

Ok. We'll call you at 11:30. Ken, what's the best number for you?

From: Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>

Sent: Friday, December 22, 2023 8:11:57 AM

To: Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>

Cc: Kenneth Montgomery <ken@kjmontgomerylaw.com>; Stern, Dylan (USANYE) <DStern1@usa.doj.gov>; Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Duncan Levin <dlevin@levinpllc.com>

Subject: Re: [EXTERNAL] Re: Ozy Media and Carlos Watson

I can do 11.30. I'll be in transit, but I'll take the call.

Sent from my iPhone. Please excuse any errors.

On Dec 22, 2023, at 7:15 AM, Siegel, Jonathan (USANYE) <Jonathan.Siegel@usdoj.gov> wrote:

If there is a time that works for you both, we can work around that. Otherwise, we can talk to Ron at 10 and then catch up with you at 11:30, if that works.

From: Kenneth Montgomery <ken@kjmontgomerylaw.com>

Sent: Friday, December 22, 2023 1:02:59 AM

To: Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>

Cc: Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>; Stern, Dylan (USANYE) <DStern1@usa.doj.gov>; Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Duncan Levin <dlevin@levinpllc.com>
Subject: [EXTERNAL] Re: Ozy Media and Carlos Watson

Sorry, I just saw this. I have to be in Horizon juvenile facility tomorrow morning. I am free at 11:30 and 1 pm and the rest of the evening after 3 pm.

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On Thu, Dec 21, 2023 at 10:39 PM Siegel, Jonathan (USANYE) <Jonathan.Siegel@usdoj.gov> wrote:

Great, let's do 10. What's the best numbers to reach you both at at that time?

From: Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>
Sent: Thursday, December 21, 2023 9:35:46 PM
To: Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>
Cc: Kenneth Montgomery <ken@kjmontgomerylaw.com>; Stern, Dylan (USANYE) <DStern1@usa.doj.gov>; Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Duncan Levin <dlevin@levinpllc.com>
Subject: [EXTERNAL] Re: Ozy Media and Carlos Watson

I'm free between 8-10:30.

Sent from my iPhone. Please excuse any errors.

On Dec 21, 2023, at 9:30 PM, Siegel, Jonathan (USANYE) <Jonathan.Siegel@usdoj.gov> wrote:

Thank you. Is there a good time for us to speak tomorrow morning?

From: Ronald Sullivan <rsullivan@ronaldsullivanlaw.com>
Sent: Thursday, December 21, 2023 7:39:08 PM
To: Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Kenneth Montgomery <ken@kjmontgomerylaw.com>
Cc: Stern, Dylan (USANYE) <DStern1@usa.doj.gov>; Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Duncan Levin <dlevin@levinpllc.com>
Subject: [EXTERNAL] Re: Ozy Media and Carlos Watson

Dear All,

Sorry, I've been out Christmas shopping and late to the thread.

I've spoken to Ken. Neither of us provided any material or information for the civil case you reference. That would include material for paragraphs 104, 106, and 107.

Same answer with respect to paragraph 132. I will look at the complaint tomorrow, though, and if we are in possession of something not disclosed, we will remedy it. But, to the best of my knowledge, we have disclosed all producible material.

Both Ken and I are happy to jump on a call if that's easier.

Best,

Ron

From: "Siegel, Jonathan (USANYE)" <Jonathan.Siegel@usdoj.gov>
Date: Thursday, December 21, 2023 at 4:51 PM
To: Ron Sullivan <rsullivan@ronaldsullivanlaw.com>, Kenneth Montgomery <ken@kjmontgomerylaw.com>
Cc: "Stern, Dylan (USANYE)" <Dylan.Stern@usdoj.gov>, "Kassner, Gillian (USANYE)" <Gillian.Kassner@usdoj.gov>, Duncan Levin <dlevin@levinpllc.com>
Subject: Ozy Media and Carlos Watson

Ken and Ron,

I hope you are both well. We saw the complaint Ozy filed against Ben Smith and BuzzFeed (No. 23-CV-9412 (E.D.N.Y.)) and noticed a few things that we wanted to discuss with you.

First, paragraphs 104, 106 and 107 appear to quote from internal BuzzFeed emails that have been produced in discovery in our case. Use of discovery material for litigation in another case would violate our protective order. Could you please confirm that protected discovery material was not used in connection with Ozy's civil litigation, and if it was not used, could you please explain how Ozy obtained those internal documents outside of discovery in our case?

Second, paragraph 132 quotes from a letter allegedly written by Mr. Rao discussing the call with Goldman in February 2021. Although that letter would be covered by the subpoenas served on Ozy and Mr. Watson, it does not appear you have produced it to us. Could you please point us to it in your productions? If it has not been produced, please produce it promptly and explain why it was not produced previously.

Thank you.

Best,

Jon

Jonathan Siegel

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Eastern District of New York

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